

REMARKS

This is intended as a full and complete response to the Office Action dated May 14, 2004, having a shortened statutory period for response set to expire on May 14, 2004. Applicant canceled claims 1-9 and added new claims 10-35. Please reconsider the claims pending in the application for reasons discussed below.

Information Disclosure Statement

The Examiner has not initialed indicating consideration of U.S. Publication No. 2003-0024708, which is cited in the information disclosure statement dated January 16, 2004. Applicant requests acknowledgement of consideration of this reference along with acknowledgement of consideration of the reference in the IDS filed April 2, 2004.

Claim Rejections - 35 USC § 102

Claims 1-3 and 5-8 are rejected under 35 U.S.C. § 102(b) as being anticipated by *Andresen et al.* (U.S. Patent No. 3,062,568).

Applicant canceled claims 1-3 and 5-8, thereby obviating the rejection. Accordingly, Applicant respectfully requests withdrawal of the rejection. Regarding new claims 10-29, Applicant submits that *Andresen et al.* fails to teach, show or suggest the claimed invention.

Specifically, *Andresen et al.* fails to teach, show or suggest an expanded wellbore connection between tubulars that includes "a wire thread plastically deformed," as recited in claim 10. To the contrary, *Andresen et al.* teaches a thread lead without any mention of a wire thread plastically deformed. Thus, Applicant submits that claim 10 and claims 11-15, which depend from claim 10, are patentable over *Andresen et al.* and requests allowance of these claims.

Further, *Andresen et al.* fails to teach, show or suggest "expanding the connection with a radial force," as recited in claim 16. Thus, Applicant submits that claim 16 and claims 17-19, which depend from claim 16, are patentable over *Andresen et al.* and requests allowance of these claims.

Additionally, *Andresen et al.* fails to teach, show or suggest "causing the

insert to at least partially establish a mechanical relationship between the tubulars by expansion of the connection with a radial force," as recited in claim 20. Thus, Applicant submits that claim 20 and claims 21-29, which depend from claim 20, are patentable over *Andresen et al.* and requests allowance of these claims.

Furthermore, *Andresen et al.* fails to teach, show or suggest an expanded tubular connection for use in a wellbore that includes "an expanded insert disposed between the female and male threads, the insert lockingly engaging the female and male threads," as recited in claim 30. To the contrary, *Andresen et al.* teaches a thread lead without any mention of an expanded insert. Thus, Applicant submits that claim 30 and claims 31-15, which depend from claim 10, are patentable over *Andresen et al.* and requests allowance of these claims.

Claim Rejections - 35 USC § 103

Claims 4 and 9 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Andresen et al.* in view of *Arcella et al.* (U.S. Patent No. 4,140,337).

Applicant canceled claims 4 and 9, thereby obviating the rejection. Accordingly, Applicant respectfully requests withdrawal of the rejection. Regarding new claims 10-29, Applicant submits that *Andresen et al.* in view of *Arcella et al.* fails to teach, show or suggest the claimed invention.

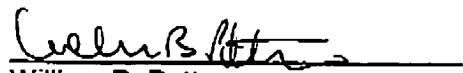
The examiner has cited *Arcella et al.* merely for the purpose that *Arcella et al.* discloses a sealant on threads. However, *Arcella et al.* fails to supply elements of claims 10-35 that are also missing from *Andresen et al.*, as discussed above. Thus, *Andresen et al.* and *Arcella et al.*, either alone or in combination, fail to teach, show or suggest the pending claims. Accordingly, Applicant respectfully requests allowance of claims 10-35.

Conclusion

The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicant's disclosure than the primary references cited in the office action. Therefore, Applicant believes that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed. Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully requests that the claims be allowed.

Respectfully submitted,



William B. Patterson
Registration No. 34,102
MOSER, PATTERSON & SHERIDAN, L.L.P.
3040 Post Oak Blvd. Suite 1500
Houston, TX 77056
Telephone: (713) 623-4844
Facsimile: (713) 623-4846
Attorney for Applicant